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Subject: NPRM FCC 05-235

I have been a ham for about 50 years, having first been licensed during my high school days in Media, PA in 1955. At that time one of my science teachers encouraged me to qualify for an amateur radio license. Acquiring a license, he commented, would be a very challenging task, requiring mastering Morse code and learning a substantial amount of theory, but the rewards for learning would be great. I chose to first learn the code at 13 wpm, which was required at that time for a General Class license.

In the intervening 50 years I've found that participating in the Amateur Service and upgrading to Amateur Extra class has provided me many opportunities for making "RF friendships" and growing technically. It led to my eventual choice of college degrees (BSEE, BS Bus and MBA), and to spending my entire career in the telecommunications industry. I believe the difficult challenge of qualifying for my first license has shaped much of my entire life, and I have never regretted a moment of its influence.

My comments about NPRM FCC 05-235 concern two areas:

1. HARD WORK
2. PERMITTED MODES

#### HARD WORK

A singular thought occurs to me every time I read of the Commission's effort to revise the Part 97 Rules. In general, your recurring theme seems to be to make it easier to become licensed. My question is: WHY MAKE IT EASIER TO OBTAIN AN AMATEUR LICENSE? WHY NOT MAKE IT HARDER BY RETAINING (OR EVEN INCREASING) THE MORSE CODE REQUIREMENT?

If the Commission's intent in eliminating the code requirement is to ease the licensing procedure for

applicants, it might succeed; mastering CW is far from easy. But it seems to me that a much more compelling FCC objective ought to be to enrich the utilization of available spectrum by doing just the opposite: MAKE IT HARDER TO BECOME LICENSED and make better use of available bandwidth.

The Commission's spectrum management task is clearly a daunting one. It seems to me that using spectrum as effectively and professionally as possible by making the licensing process tougher, would be a better way to proceed.

Instead of following the "dumbing down" path so prevalent nowadays in our country, your job in rewriting the Part 97 rules ought to require applicants to demonstrate greater skill than simply answering a set of general theory and regulatory questions. One way of doing would be to retain the Morse code requirement. I believe that retaining, or better yet strengthening, the Morse code requirement, rather than stopping it, would be a huge step in the right direction.

Who knows? Doing that might even make it feasible to reallocate some of the current Amateur Service spectrum to other needs, given the inherent greater bandwidth efficiency of CW vis-à-vis other modes.

I believe that whether a licensee utilizes the CW mode isn't nearly as important as making the best use of spectrum AND with the best-qualified licensees. At least maintaining the difficulty of becoming licensed would make more sense for the amateur community and for the Commission. I URGE THE COMMISSION TO KEEP THE CODE REQUIREMENT INTACT.

## 2. PERMITTED MODES

Since specific portions of the amateur bands are already off limits to SSB, AM, FM voice, and other wide-bandwidth modes, my opinion is that CW ought to be required everywhere else. Given the skill required to communicate via Morse code and its narrower bandwidth requirements, the rationale for completely eliminating Morse testing for applicants escapes me.

I further believe that periodic retesting of licensees in both the CW mode as well as the theoretical and regulatory areas could be made part of this NPRM. The Part 97 Rules once required that license

renewal applicants have in their logs a sufficient number of recent CW contact entries to support an application for renewal. In those days (in my case the late 1950s), recent evidence of code proficiency made perfect sense, at least to me. If the mode was authorized under the terms of one's license, then it ought to be utilized. I haven't changed my mind about that.

Thank you for considering my comments.

Sincerely,

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